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Ms. Margaret M. Salas
Secretary
Federal Communications Commission
1919 M Street N.W.
Room 222
Washington, D.C. 20554

Re: Ex Parte Comments to Petitions for Reconsideration : WT Docket 97-82

Dear Secretary Salas :

Wireless Nation, Inc. is a start-up reseller of wireless services in the New York region. In our prior filings, we have asked that the Commission revisit the present restructuring options with the request that the Commission make modest adjustments that remove the highly punitive penalties that stand in the way of commercially reasonable alternatives for the C block licensees. In doing so, the Commission will create a viable C block able to provide the level of competition envisioned by the Telecommunications Act of 1996. To date, we are alarmed that the Act has brought only consolidation in the industry and not competition as intended. Further, the wireless resale sector has been gravely impacted by the lack of competition.

Carriers opposing restructuring such as AirGate Wireless, L.L.C. have stated that "wireless resellers have multiple carrier choices without the C block". During 1997's "C block restructuring debate", Wireless Nation has seen wireless resale shrink considerably right before our eyes. The attached table compares RCR's year-end 1996 Top 20 Reseller list to year-end 1997 and shows the considerable extent to which the reseller customer base of these companies with respect to the industry customer base has fallen off in just 12 months. Additionally, last year's growth rate by the top 20 resellers was nearly half that of the industry (17% vs. 30%). Do you think such a down turn is by chance or by design?

The National Wireless Resellers Association (NWRA) in its 1997 Survey of Wireless Resellers found that "more than 70% of resellers reported being denied access to bulk discounts offered by carriers to their own retail customers". The same survey reports "50% of resellers were denied access to a cellular resale agreement" altogether and that "over 60% said they were denied access to a PCS resale agreement". Without a healthy C block, how long can small businesses such as mine that rely on economical resale terms from the wireless carriers survive before we are all but eliminated by the incumbent carriers? The same incumbents have opposed the C block restructuring for self-serving, anti-competitive reasons. We urge you to reconsider the affect the Commissions decision has had on other small

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businesses dependent upon a viable C block. We need a competitive wireless marketplace to survive and strongly urge you to offer the C block licensees an economically viable set of options.

Specifically, Wireless Nation respectfully requests that the Commission reconsider certain aspects of the Order and modify its ruling to:

1. Allow licensees to utilize their full down payment in the disaggregation and prepayment options.
2. Adjust the prepayment option to reflect the net present value of forgoing installment payments.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Oye Obe', with a stylized flourish at the end.

Oye Obe, CEO
Wireless Nation, Inc.
230 Pelham Road, Suite 5L
New Rochelle, NY 10805

RCR's Top 20 Wireless Resellers by Number of Subscribers

Company	HQ	YE 96	YE 97	Sub-Growth	% Growth
MCI	Nationwide	400,000	450,000	50,000	13%
WorldCom	AZ	114,000	130,000	16,000	14%
Progressive Concepts	TX	73,000	76,000	3,000	4%
Connecticut Telephone	CT	56,250	65,100	8,850	16%
Cellnet Communications	MI	60,000	60,000	-	0%
Prime Matrix	CA	50,500	52,000	1,500	3%
Northwest	OR	33,005	51,104	18,099	55%
Phase 2 Cellular	AZ	27,200	46,000	18,800	69%
DCN/Robo Wireless	CA	33,760	38,655	4,895	14%
Select Wireless	MN	26,000	35,000	9,000	35%
Cellular Plus	MI	18,000	20,000	2,000	11%
Cellnet Telecomm.	OH	15,000	16,500	1,500	10%
One Source Comm.	MI	10,000	15,000	5,000	50%
SkyNet	IL	N/A	12,456	N/A	N/A
Marathon Comm.	WA	N/A	10,000	N/A	N/A
The Mobile Phone	FL	N/A	96,000	N/A	N/A
Cellular Dynamics	IL	8,500	9,500	1,000	12%
Worldwide Mobilecom	FL	N/A	8,000	N/A	N/A
Cortelco Puerto Rico, Inc.	PR	10,162	7,400	-2,762	-27%
SanDiego Wireless Comm.	CA	N/A	6,100	N/A	N/A
Mobile One Wireless Network	FL	11,500	N/A	N/A	N/A
America Communications Ntwrk.	MI	8,206	N/A	N/A	N/A
Total		955,083	1,118,415	163,332	17%
Resellers as % of Total US Subscribers		2.20%	1.90%		
Industry Growth reported by CTIA					30%